Exhibit A

- 1. This is a petition for the involuntary bankruptcy of Kenneth Ira Starr pursuant to 11 U.S.C. § 303(b) filed by petitioners Estate of Joan A. Stanton (the "Estate") and JAS Ventures, L.P. ("JAS").
- 2. Petitioners file this involuntary petition in good faith for the benefit of all creditors of Mr. Starr and not to obtain any improper benefit.
- 3. Petitioners also request the appointment of a trustee to preside over the estate of Mr. Starr.
- 4. Under 11 U.S.C. § 303(b)(1) and (2), if there are fewer than twelve holders of claims against a debtor that are "not contingent as to liability or the subject of a bona fide dispute as to liability or amount," any holder or holders of such claims in the aggregate of at least \$10,000 may commence an involuntary bankruptcy proceeding against the debtor.
- 5. Based on petitioners' knowledge and investigation, there are fewer than twelve holders of such claims against Mr. Starr.
- 6. Petitioners hold claims against Mr. Starr that are "not contingent as to liability or the subject of a bona fide dispute as to liability or amount" and that exceed \$10,000.
 - 7. These claims arise out of a settlement agreement dated January 7, 2010.
- 8. Mr. Starr breached that agreement by failing to make a required payment due on July 1, 2010. Under the terms of the agreement, Mr. Starr's default accelerated all amounts owed under the settlement agreement and made them immediately due and payable. In addition, those amounts began to bear interest at the annual rate of 9% (compounded quarterly) from July 2, 2010, the day following the default.

- 9. JAS holds a claim against Mr. Starr for \$1,050,000, plus interest in the amount of \$53,551.91 for a total claim amount of \$1,103,551.91, exclusive of attorneys' fees and costs of collection payable under the settlement agreement.
- 10. The Estate holds a claim against Mr. Starr for \$1,050,000, plus interest in the amount of \$53,551.91 for a total claim amount of \$1,103,551.91, exclusive of attorneys' fees and costs of collection payable under the settlement agreement.
 - 11. Despite due demand, Mr. Starr has paid no portion of these amounts outstanding.
- 12. Mr. Starr was indicted by a federal grand jury on June 10, 2010. In the indictment, 1:10-cr-00520-SAS, Mr. Starr was charged with 20 counts of wire fraud and one count each of securities fraud, money laundering and fraud by an investment advisor. On September 10, 2010, Mr. Starr pled guilty to certain counts of that indictment.
 - 13. Mr. Starr is currently incarcerated and will be sentenced on March 2, 2011.
- 14. Based on knowledge and investigation, Mr. Starr has generally not been paying his debts as they become due.
- 15. City National Bank obtained a judgment against Mr. Starr in October 2010. In addition, American Express and Bank of America are pursing civil actions against Mr. Starr.
- 16. Aurora Cassirer, a court-appointed receiver for Starr & Co. and Starr Investment Advisors, LLC (two companies owned by Mr. Starr) also has filed suit against Mr. Starr.